DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B602749486

FACILITY: Inteva Products Adrian Operations		**SRN / ID:** B6027
LOCATION: 1450 E. BEECHER ST, ADRIAN		**DISTRICT:** Jackson
CITY: ADRIAN		**COUNTY:** LENAWEE
CONTACT: Duke Couch , Environmental, Health, & Safety Manager		**ACTIVITY DATE:** 07/11/2019
STAFF: Stephanie Weems	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

Major / ROP Source. Full Compliance Evaluation (FCE) and Inspection (PCE) of Inteva Products LLC – Adrian.

Facility Contacts:

Duke Couch, Environmental, Health & Safety Manager
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Purpose

On, July 11, 2019 I conducted an unannounced compliance inspection of the Inteva Products LLC – Adrian facility located in Adrian, Michigan (Lenawee County) at 1450 E. Beecher Street. I was accompanied by Diane Kavanaugh Vetort, AQD Senior Environmental Quality Analyst for the Jackson District Office. The purpose of the inspection was to determine the facility's compliance status with applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules, and the conditions of Inteva's Renewable Operating Permit (ROP) number MI-ROP-B6027-2018 issued April 17, 2018.

Facility Location

The facility is located within the city limits of Adrian. It is immediately surrounded by other commercial / industrial sources. See attached aerial photo.

Facility Background

This facility was last inspected on May 17, 2018 and found to be in compliance except for a minor recordkeeping violation. During the inspection, it was noted that the facility had failed to record the bake oven temperature for approximately two months. A Violation Notice (VN) was not sent because the data recording problem had been resolved prior to the inspection.

Inteva Products manufacturers instrument and door panels for General Motors vehicles. The main production operations at the facility include plastic injection molding and instrument panel assembly. The facility's ROP is for four automated spray paint lines (EU-P5, EU-Paint 1, EU-Paint 2, and EU-Paint 3) which are equipped with water-wash systems, robotic spray paint booths, and natural gas dryer ovens. EU-Paint 1 is Inteva's most advanced coating line, and is equipped with additional air pollution control equipment, including a rotary carbon concentrator (RCC) and a regenerative thermal oxidizer (RTO). A third paint booth (EU-CKIP#2) is used for more small-scale painting activities, such as small-scale service part orders. There are additional emission units (EU) that are incorporated in Inteva's ROP that operate under specific permit to install (PTI) exemptions (Rule 280 through Rule 290).

In Inteva's production process, plastic pellets used for injection molding are delivered and transferred to the facility's storage tanks. The pellets are sent through a drying process before utilization in the facility's injection molding machines. Several additional onsite emission units, not incorporated in Inteva's ROP, are exempt from the requirement to obtain a PTI and are described in the onsite narrative below.

Inteva's ROP does not specify facility-wide volatile organic compound (VOC) limits, but instead stipulates emission unit-specific VOC limits. For the 2018 reporting year, Inteva reported the following VOC emissions for their Michigan Air Emissions Reporting System (MAERS) submission:

- 14.44 tons for EU-P5 (emission limit: 55 tons per year (tpy))
- 0.1 tons for EU CKIP#2 (emission limit: 54.4 tpy)
- 24.3 tons for EU-Paint 1 (emission limit: 40 tpy)
- 0 tons for EU-Paint 2 (emission limit: 39.5 tpy)
- 0.78 tons for EU-Paint 3 (emission limit: 25.0 tpy)

Arrival & Facility Contacts

Visible emissions or odors were not observed upon our approach to the facility via Beecher Street. We arrived at approximately 10:58 AM, proceeded to the facility office to request access for an inspection, provided our identification, and asked if Duke Couch, Environmental Health and Safety Manager, was available. We had to read and sign a safety waiver before being escorted by Duke to his office. We were joined by Ryan Robinson, Controller for the Adrian Operations, and Perry Mulhollen, EHS Representative. I informed them of our intent to conduct a facility inspection and to review the various records required by their permit. They extended their full cooperation during the inspection and fully addressed our questions. Duke and Perry accompanied us during the inspection.

(Note: Photos aren't allowed to be taken at this facility.) Safety glasses, a high-visibility vest, and safety boots are needed to tour this facility.

Regulatory Applicability

The facility is a considered a Major/Title V source for volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions. The facility is regulated by ROP number MI-ROP-B6027-2018.

This facility is subject to the following federal standards:

-Title 40 of the Code of Federal Regulations (CFR), Part 63, Subpart PPPP - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products.

-40 CFR Part 63, Subpart A – National Emission Standards for Hazardous Air Pollutants General Provisions.

-40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (also referred to as the RICE MACT).

NOTE: As of July 19, 2019 EGLE has delegation to implement Subpart ZZZZ.

The Cleaver Brooks boilers are not subject to 40 CFR Part 63 Subpart DDDDD- National Emission Standards for Hazardous Air Pollutants for Major Sources; Industrial, Commercial, and Institutional Boilers and Process Heaters or 40 CFR Part 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units because they are temporary boilers as defined in 63.7575.

The facility reports its emissions to MAERS and is designated as a Fee Category I source.

Pre-Inspection Meeting

The pre-inspection began with a background summary of Inteva, provided by Duke. He informed us that the facility employs 662 people. They run 3 shifts, 5 days per week with an occasional sixth day based upon customer demand.

We discussed the changes that have occurred at the facility since the last inspection. Duke informed us that production is up, but emissions are down. When asked how this could be, he explained that the facility is moving towards using "in-color" injection molding more than painted processes now. Therefore, many of the processes in their ROP are currently not in operation, and the paint booths and coating lines that are in operation are not operating every day. EU-Paint 1 (connected to the RTO) and EU-Paint 2 are two of the lines that are currently not in operation. Thus, the RTO is not currently in operation. He indicated that there has been talk of removing the paint lines, but it hasn't been decided on yet.

I provided him with a records request sheet to conclude the meeting.

Onsite Inspection Narrative

EU-ADHCT-North and EU-ADHCT-South

EU-ADHCT-North and EU-ADHCT-South, which both operated under a Rule 290 exemption, are processes that consisted of application of an adhesive (consisting of polyurethane and isocyanate) to a plastic instrument panel substrate. It is then heated / thermoformed to join the "foam skin" to the instrument panel substrate. The final product is described as a hand-wrapped instrument panel. As of June 2018, these emission units are no longer operating. Duke stated these units have been taken out of operation, and the facility now uses EU-EastBth_013 for their adhesive booth.

Rule 201/ROP Exempt Processes

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EU-MISC-HEATERS	Miscellaneous Direct Fired Gas Space Heaters < 10 MMBTU/hour	Rule 282(2)(b)(i)	Rule 212(4)(c)

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EU-BOILER#35-1	Cleaver Brooks natural gas fire boiler A-35 -1. 14.645 mmBTU/hour	Rule 282(2)(b)(i)	Rule 212(4)(c)
EU-BOILER#15-2	Cleaver Brooks natural gas fire boiler A-15 -2. 6.2775 mmBTU/hour	Rule 282(2)(b)(i)	Rule 212(4)(c)

During the inspection we walked outside to look at the boilers. Each boiler is located within its own trailer (Image 2). These trailers can be hitched and moved. Duke confirmed that they are only used for heating in the winter.

We also observed the two diesel engines associated with the facility's firefighting equipment. These are housed in a building located to the north of the facility (Image 3) Duke showed us the non-resettable hour meter on the units.

EU-P5

EU-P5 is a coating line consisting of a three-section water wash spray booth with six robotic applicators, a natural gas-fired flash oven (used to flash off carrier solvents and begins the pre-curing process), and a natural gas-fired curing oven. This spray booth employs a downdraft system, with clean air supplied from the ceiling and is drawn out from the floor. The airstream goes through the water wash stream before being discharged to the atmosphere via the stack. Duke indicated that this line is operating approximately every other day, or 2-3 days per week. They only run this line for one shift. As of the time of the inspection it was not operating, but work was being done on it. Previously it had been down for about 2 weeks because the company that would receive the parts from this line was on break for those two weeks. The oven was on and operating at 195 degrees F during the time of the inspection. We pointed out to Duke that the ROP has VOC emission limits for EU-P5 that indicate the plastic coatings should be "air-dried"; meaning that the oven needs to be operating below 194 degrees F (R 336.1101). Duke took note of this and said he would work on getting that corrected right away.

EU-Paint 3

EU-Paint 3 is an instrument panel coating line consisting of one automatic spray dry filter booth and one natural gas-fired bake oven. Duke stated that this line is now used for service only and is rarely operational. It was not operating at the time of the inspection.

EU-Paint 1

EU-Paint 1 is an instrument panel paint system consisting of a robotic flame treatment system, two robotic paint booths (No. 1 and 2), followed by a flash-off tunnel (No. 1), and then followed by a natural-gas fired paint bake oven. We observed that each booth is equipped with a water-wash system to control particulate overspray. VOC emissions are controlled by an RCC and RTO, except during RTO by-pass mode. Duke indicated that this line has not been used since February 2019.

The RTO was not operating and is not expected to be restarted since they are able to meet their VOC limits without it. He explained that they have measures set in place to where, if they began operating this line and their VOC emissions were to reach 33 tons, they would get the RTO started up again.

EU-Paint 2

EU-Paint 2 is an instrument panel paint system consisting of a robotic flame treatment system, two robotic paint booths (Nos. 3 and 4), followed by a flash-off tunnel (No. 2), and then followed by a natural-gas fired paint bake oven (which is shared with EU-Paint 1). Each booth is equipped with a water-wash system to control particulate overspray. EU-Paint 2 was not in operation during the site tour, but I did observe the water-wash system in place, as required by SC IV.1. EU-Paint 2 has also not been used since February of 2019 and they have no intent to start using it again.

EUCKIP-#2

EUCKIP-#2 is a paint system that consists of a manual paint booth and paint bake ovens. Paint is applied via HVLP spray guns, and the booth is equipped with a water wash over spray control. The booth was not operating at the time of the inspection. I did observe that the water-wash control was in place and that the channel overflow had sufficient coverage over the width of the booth back wall, per SC IV.1. Duke indicated that this booth is also rarely used.

EU-EastBth_013

EU-EastBth_013 was the east water wash spray booth with manual conventional spray guns. Duke explained that this spray booth was removed, and a new booth was put in its place. The new booth is now an adhesive application booth that Duke said they operate under Rule 287(2)(c). We observed that the dry filter control was installed in the booth.

EU-CARP-PNT

EU-CARP-PNT is currently used to coat small-scale items using aerosol cans. The facility includes this under their Rule 287 (2)(c) exempt equipment. During the inspection, we observed the booth and noted that the dry filter control was in place. The booth is rarely used.

EU-Touch-Up

EU-Touch-Up is for instrument panel touch-up and repair. The facility included this under their Rule 287(2)(c) exempt equipment. Duke indicated that this unit has not been used since February 2019. He explained that they now incorporate the touch-up and repair into EUCKIP-#2.

FG-NonHalogen/ COLDCLEANERS

There are no longer any cold cleaners at the facility.

EU-HandAdh

This emission unit consists of the hand application of adhesive. The facility includes this under their Rule 287(2)(c) exempt equipment. According to Duke, this unit has not been in operation since May of 2018.

Facility Wide Observations

During the inspection we observed the 16 material storage silos located at the facility. Duke indicated that not all the silos are currently in use. These silos, located inside the facility, house the plastic resin used in the facility's injection molding process. The material in these silos is moved throughout the facility using piping and smaller, intermediate resin storage silos, and is automatically applied to the injection molding process through this piping. Inteva currently uses two colors of plastic resin, black and very dark brown.

We were also shown around the area of the injection molding and adhesive equipment. There are currently 26 injection molding machines and 6 hot-melt adhesive application booths. Of the 6 adhesive booths, one is enclosed with a filter control, 3 are enclosed with no filter control, and 2 are non-enclosed. Duke explained that originally, the booths were not enclosed, but he has been updating some of their processes in order to provide better working conditions for plant employees.

Facility appears to be well maintained. During the entire facility tour, I only observed waste material collected in closed containers, per permit requirements. Overall, Inteva appears to be practicing excellent facility housekeeping.

Post-Inspection Meeting

We returned to Duke's office and held a brief post-inspection meeting with Duke and Perry. We reviewed what recordkeeping and compliance information was expected to be provided to AQD. We informed them that we did not have any other immediate concerns at that time. We thanked them for their cooperation and assistance and departed the facility at approximately 2:22 PM.

Recordkeeping Request

The following records were requested:

EU-P5 VI. MONITORING/RECORDKEEPING Conditions 3. All required records for **January 2019 to June 1st**.

EU-P5 VI. MONITORING.RECORDKEEPING Condition 4. All required records for **May 2019.**

EU-CKIP#2 VI. MONITORING/RECORDKEEPING Conditions 1-5. All required records for **January 2019 to June 1st.**

EU-Paint 1 VI. MONITORING/RECORDKEEPING Conditions 2, 3, 4, 5. All records for **May 2019.**

EU-Paint 1 VI. MONITORING/RECORDKEEPING Condition 7. All records for **January 2019 to June 1st**.

EU-Paint 2 VI. MONITORING/RECORDKEEPING Conditions 3 & 4. All records for **January 2019 to June 1st**.

EU-Paint 3 VI. MONITORING/RECORDKEEPING Conditions 2. All records for **May 2019**.

EU-Paint 3 VI. MONITORING/RECORDKEEPING Condition 4. All records for **January 2019 to June 1st**.

FG-RULE 287(2)(c) VI. MONITORING/RECORDKEEPING Conditions 1. All records for **January 2019 to June 1st** for each emission unit.

FG-RULE 290 VI. MONITORING/RECORDKEEPING Conditions 1 and 3. All records for **January 2019 to June 1st**.

We also asked Duke to provide evidence that the facility is complying with the requirement of maintaining a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. Additionally, we requested information to demonstrate how the facility was complying with the testing/sampling requirements that include determining the VOC content using federal reference test method 24.

Recordkeeping Review

Note: All attachments are located with this report in the facility's paper file/

Attachments 1 and 2 are the maintenance and test records for the facility's fire engines for compliance with Subpart ZZZZ. Duke explained that the facility runs the engines for a half hour every week for testing/maintenance purposes.These records show compliance with the subpart.

Attachments 3 and 4 are the SDS sheets for the highest pollutant containing materials used at the facility. These SDS sheets state the following: "This document includes all data required by 40 CFR 63.801(a) for a Certified Product Data Sheet under criteria specified in 40 CFR 63.805(a)." Therefore, by meeting the requirements of 40 CFR 63.801(a), these SDS sheets show that the company is using manufacturer's formulation data that has been formulated based upon Method 24. Additionally, Duke explained that the IPA Blend is a solvent that is used for cleaning the paint guns. These records show compliance with the testing/sampling requirements of the permit.

Attachment 5 is the Title V Recordkeeping 2019 spreadsheet supplied by Duke. The information provided shows compliance with all permit limits.

Attachment 6 is the current month paint usage log supplied by Duke. This information show compliance with recordkeeping requirements for daily usage of coatings applied for the month of May 2019.

Attachment 7 is a portion of the bake oven temperature log sent by Duke for EU-Paint 3 for June 2019. Due to the monthly log being over 200 pages, the attachment with this file shows only those temperatures recorded for June 4th and 5th. Temperatures were at or below the 194-degree F requirement stated in the permit during the entire month reported.

Attachment 8 is the facility's log for the EU-Paint 2 oven temperature alarms and shutdowns. No alarms or shutdowns were reported.

Attachment 9 shows the monthly summary reports of repairs, remedial action or preventative maintenance completed for EU-CKIP#2.

Rule 286(2)(b) applies to the injection molding processes and associated resin handling and storage equipment (silos and piping).

Rule 287(2)(i) applies to the hot-melt adhesive application booths.

In regards to Subpart PPPP, review of required compliance reports shows that the facility reports easily meeting the standard of 0.16 pounds of HAPs per pound of coating solids in 2018.

Compliance Summary

Based upon the facility inspection, review of the records, and review of applicable requirements the company was found to be in compliance at the time of this inspection.

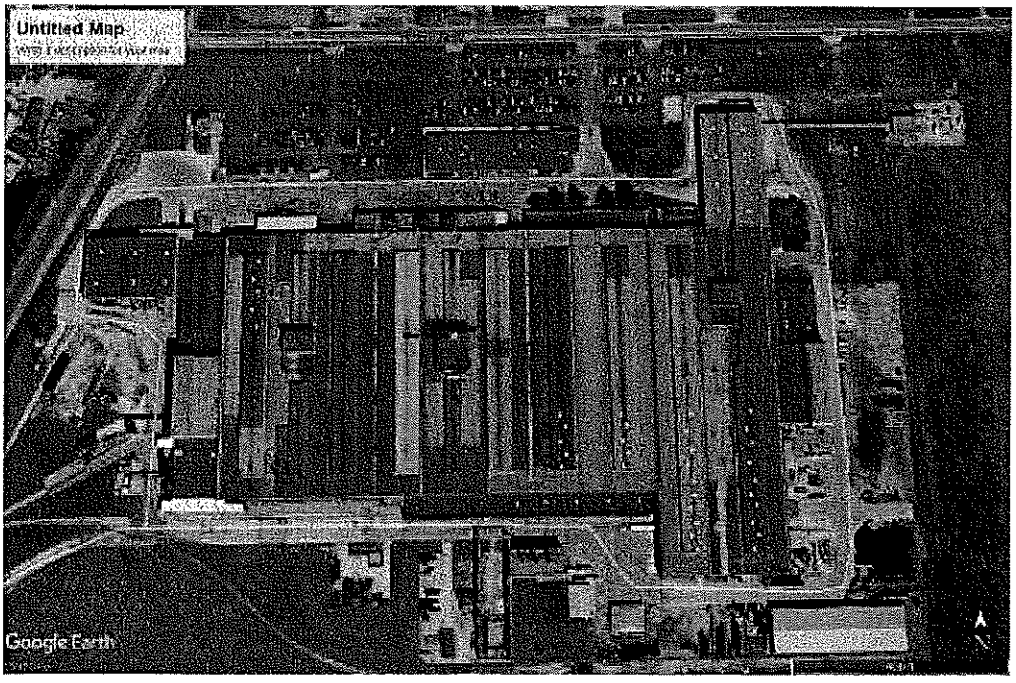

Image 1(1) : Aerial photo

Image 2(2) : Aerial view of trailers that house boilers

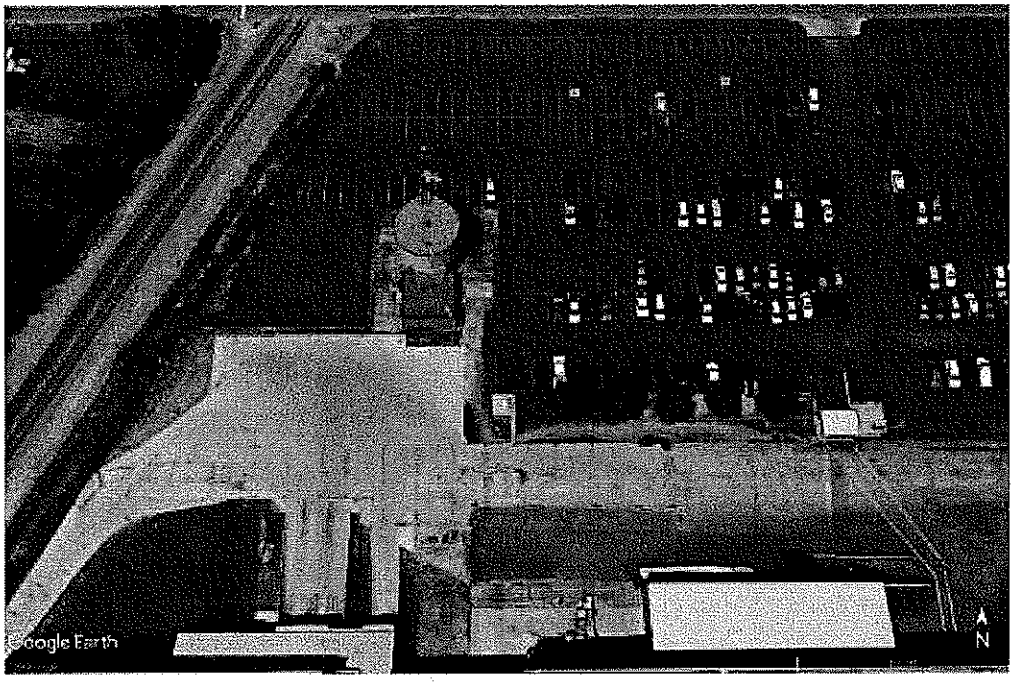

Image 3(3) : Aerial view of location of engines.

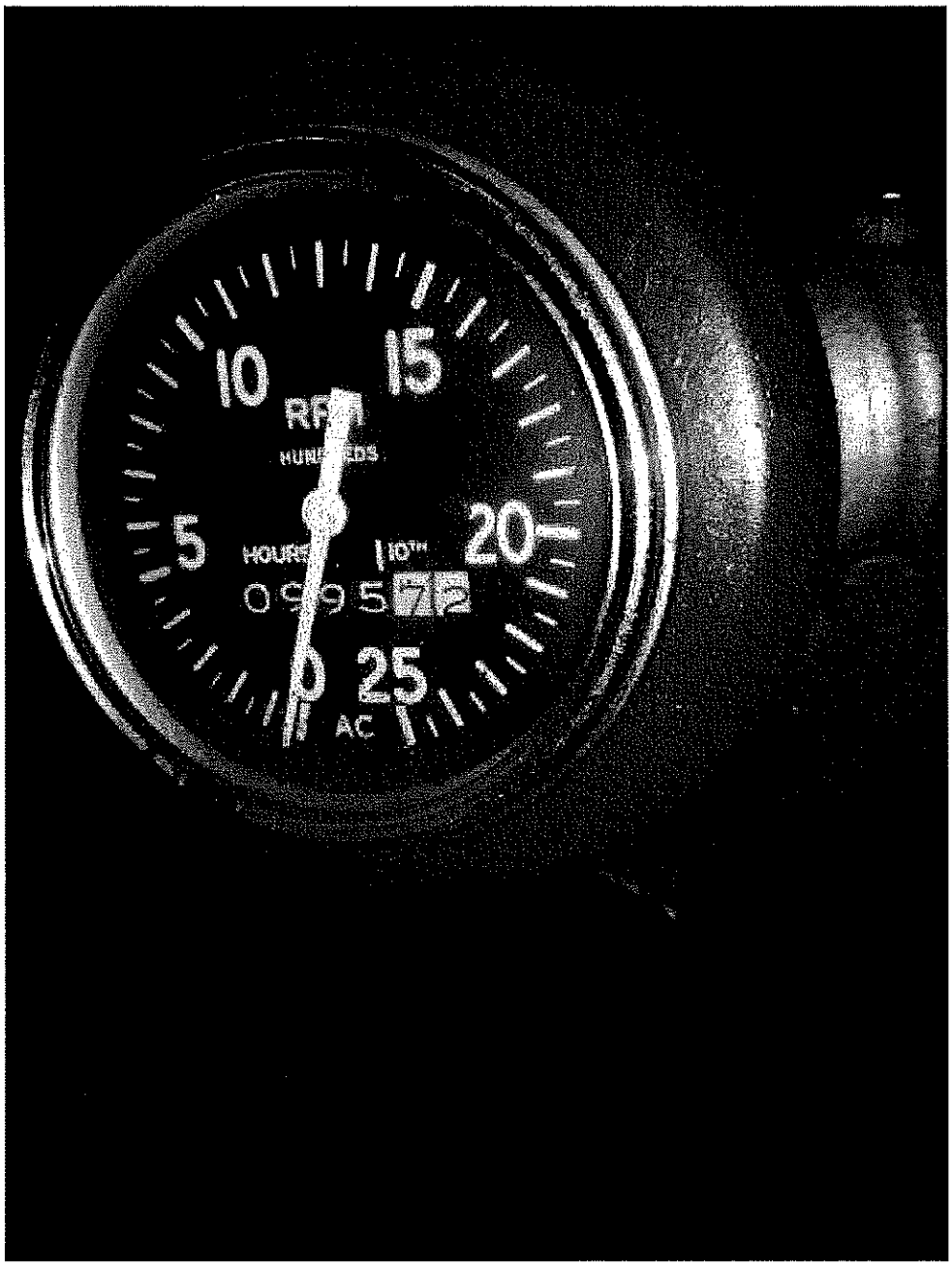

Image 4(4) : East Clarke Detroit Diesel Pump 1 - Hour Meter (Photo provided by Duke Couch)

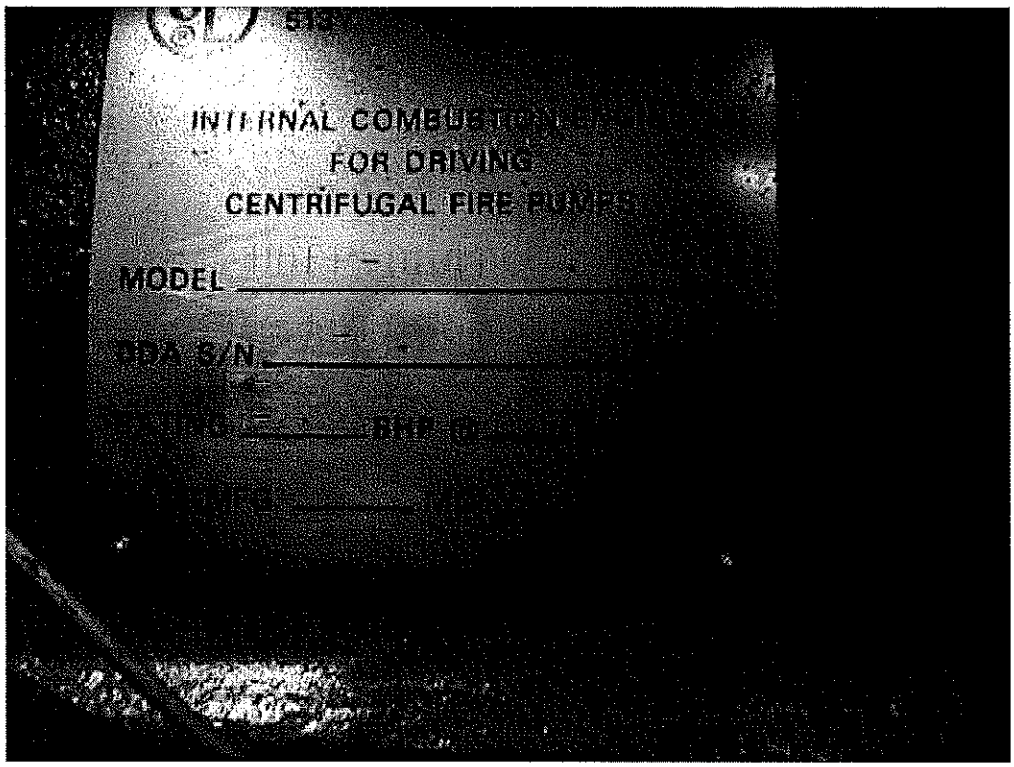

Image 5(5) : East Clarke Detroit Diesel Pump 1 - Name Plate (Photo provided by Duke Couch)

Image 6(6) : West Clarke Detroit Diesel Pump 2 - Hour Meter (Photo provided by Duke Couch)

Image 7(7) : West Clarke Detroit Diesel Pump 2 - Name Plate (Photo provided by Duke Couch)

Image 8(8) : East Clarke Detroit Diesel Pump 1 - Hour Meter Reading from May 18, 2018. Photo supplied by Duke Couch.

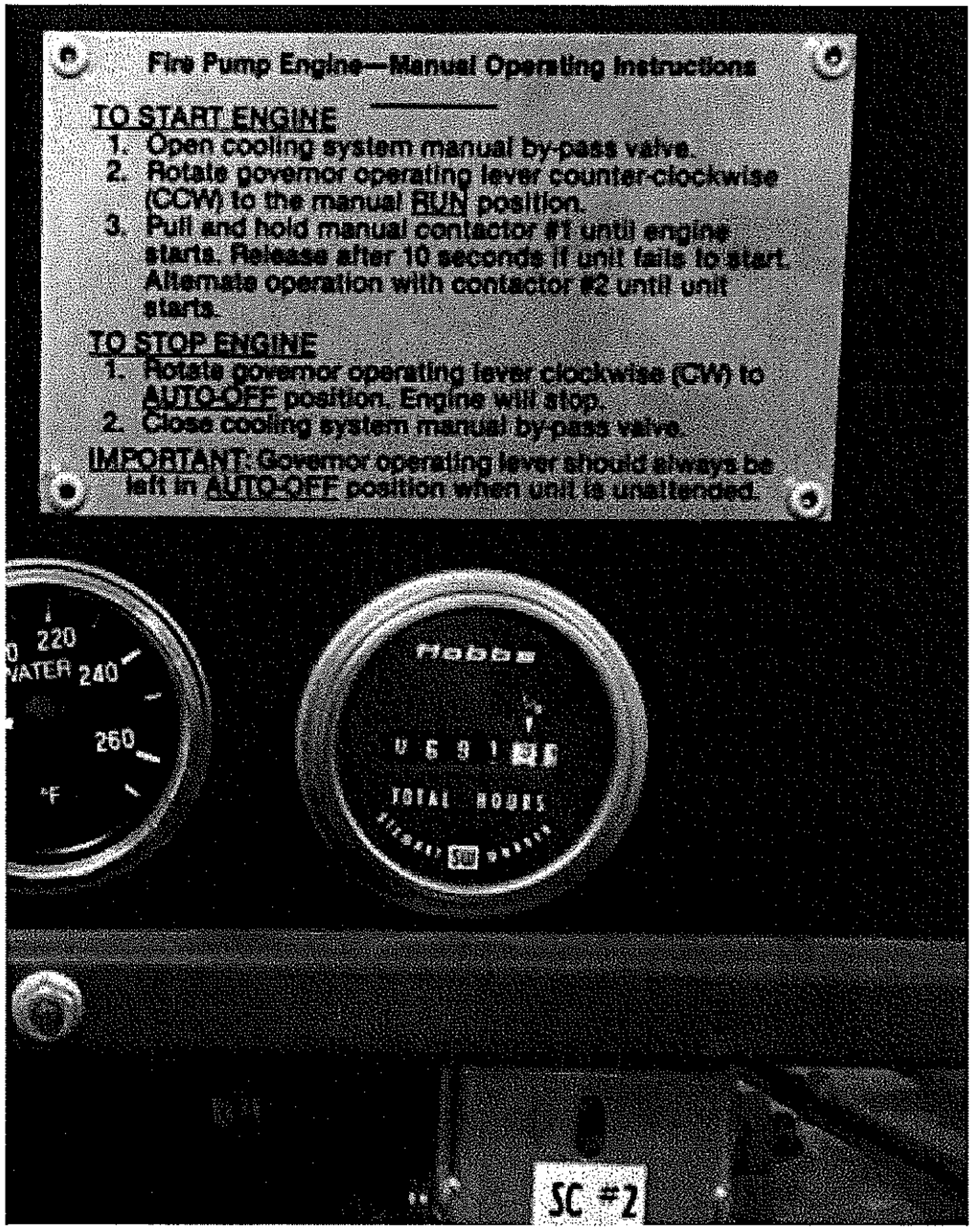

Image 9(9) : West Clarke Detroit Diesel Pump 2 - Hour Meter from May 18, 2018. Photo supplied by Duke Couch

NAME _____ DATE 8.2.19 SUPERVISOR _____